

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

<p><b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b></p>	<p><b>Master File No. 2:12-MD-02327 MDL No. 2327</b></p>
<p><b>THIS DOCUMENT RELATES TO:</b></p> <p><i>Wave 13 cases listed on Plaintiffs' Exhibit A</i></p>	<p><b>Wave 13</b></p> <p><b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b></p>

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES  
REGARDING SCOTT SERELS, M.D. FOR WAVE 13**

Plaintiffs filed a Notice of Adoption [Dkt. 8952] in the Wave 13 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Scott Serels, M.D. and Supporting Memorandum from Ethicon Wave 1, Dkt. 2112 (motion), 2113 (memorandum in support), and 2268 (reply). Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Scott Serels, M.D. for Ethicon Wave 1, Dkt. 2226. The Court previously overruled many of Plaintiffs' objections to Dr. Serels's testimony, Dkt. 2689. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 response briefing.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage

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